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NOV 16 1988

Janet Feldstein
Site Compliance Branch
Emergency and Remedial Response Division
US Environmental Protection Agency
26 Federal Plaza
New York, NY 10278

Dear Ms. Feldstein:

Re: Revision No. 8 (Amended)
Project Operations Plan
SCP - Carlstadt

Please be advised of the following comments concerning the above referenced document.

7.15.1 - Objective

In situ permeability (slug) testing does not provide satisfactory information on aquifer characteristics. This type of test will only define conditions in the immediate area of the well. A pumping test must be conducted to define aquifer characteristics.

7.15.5.3 - Drilling Operations

Any excavation into the bedrock must be sealed after examination to ensure protection of the bedrock aquifer from contamination in the till aquifer. Monitor wells must not be common to both the bedrock and the till aquifers. There is no conformation of a confining layer between the till and the bedrock thus a monitor well connecting the two would constitute a conduit between the aquifers.

7.15.5.4 - Monitoring Well Installation

Any well drilled deeper than fifty (50) feet should be constructed with schedule 40 riser pipe as the integrity of schedule 5 riser pipe becomes suspect at such depths.

Any well installed in a manhole must have a watertight flush-mount locking cap in addition to the watertight locking manhole.

7.15.5.5 - Disposition of Cuttings and Fluids

The cuttings and fluids generated offsite should be drummed and transported onsite. The majority of monitor wells are to be installed in paved or landscaped areas and it will not be possible to rake in cuttings. Cuttings that do not exhibit elevated PID levels when scanned should be stored for disposal.

The fluids generated during the entire well installation process should be considered contaminated as the aquifers that will be encountered are known to be highly contaminated. The PID will not indicate PCB or PAH contamination. Contaminated fluids could go undetected.

7.15.5.6(b) - Till Monitoring Wells

Till wells must not extend into the bedrock aquifer as a physical connection between the two aquifers would be created. As the till aquifer is severely contaminated, this interconnection could cause or increase the contamination in the bedrock aquifer.

7.15.5.8

Comments same in 7.15.1

Section 7.15.9.6 - Procedures and Site Management

Step 4 should be deionized water.

Step 6 should be air dry.

Step 7 should be DI rinse.

If you have any questions please contact me at (609) 633-0701.

Sincerely,

Pamela A. Lange, Case Manager
Bureau of Federal Case Management

sw
c. Kevin Schick, BEERA/DHSM
Linda Welkom, BGWPA/DWR
James Schmidtberger, USEPA-Region II